RDMS DocID 108275

Region 1, New England

EPA AND DEP REQUEST PUBLIC COMMENT ON THOMAS G. FARIA CORPORATION'S SITE-WIDE CLEANUP PROPOSAL, UNCASVILLE, CT

May 2010

Thomas G. Faria Corp.'s Proposal:

The Thomas G. Faria Corporation (Faria) is proposing a plan for cleaning up contamination on and from its property at 385 Norwich – New London Turnpike, Uncasville, CT. The plan includes:

- Expanding the existing on-site groundwater treatment system;
- Excavating contaminated soils;
- Removing and treating vapors from beneath and in the vicinity of the facility building; and
- Recording Environmental Land Use Restrictions to prevent disturbance of soil that cannot practicably be removed.

The U.S. Environmental Protection Agency (EPA) and the Connecticut Department of Environmental Protection (DEP) have been working with Faria to ensure the plan would meet the requirements of the Resource Conservation and Recovery Act (RCRA) Corrective Action program and are now requesting public comment on the plan.

More details inside...

Please let us know your thoughts on this proposal:

EPA and DEP invite all interested persons to express their views on this proposal.

EPA will accept written comments from **June 1 to July 16, 2010**. If you have a question or concern on the proposal, EPA and DEP want to hear from you before making a final decision.

To comment formally: please send written comments, post marked no later than **July 16, 2010,** to:

Stephanie Carr, U.S. EPA
5 Post Office Square – Suite 100/ OSRR07-03
Boston, MA 02109-3912
e-mail: carr.stephanie@epa.gov
fax: 617/918-0363

A comment form and mailer is included at the end of this document.

For more information: Please join us at Faria's public information meeting on June 15, 7:00 pm in the Council Chambers on the first floor of the Montville Town Hall, 310 Norwich – New London Tpke., Uncasville, CT

For additional questions, please contact:

Stephanie Carr, EPA
toll free phone:1-888-EPA-REG1
e-mail: carr.stephanie@epa.gov
- or -
Drew Kukucka, CT DEP
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INTRODUCTION

The U.S. Environmental Protection Agency - Region I ("EPA") and the Connecticut Department of Environmental Protection ("DEP") are requesting public comment on Thomas G. Faria Corporation's ("Faria's") proposal to address contamination at its facility in Uncasville, CT. Under the proposal, Faria would:

- Expand the existing on-site groundwater extraction and treatment system to prevent contaminated groundwater from leaving the facility property;
- Excavate contaminated soils and dispose of them at an appropriate facility;
- Extract and treat vapors from contaminated soils located beneath and in the vicinity of the facility building;
- Monitor chemical levels in groundwater on and off-site to ensure that concentrations continue to decrease and that no additional water supply wells are affected;
- Record an institutional control, such as an Environmental Land Use Restriction (ELUR), to prevent disturbance of contaminated soil to be left in three locations where complete soil removal would compromise building stability. In two of these areas, remaining soil would be capped with low permeability soil and pavement. The third area is under part of the facility building.

This document, called a "Statement of Basis," summarizes the actions performed at the Faria facility to date, the results of these actions, and the rationale for the proposed cleanup. EPA and DEP are publishing this document to provide opportunity for the public to review and comment on Faria's proposal. EPA and DEP will consider public comments on this proposal before approving it.

This document:

I. Includes a brief description and history of the Faria facility and a summary of the investigations and cleanup actions performed to date (Page 3);

II. Describes Faria's proposal for site cleanup (Page 4);

III. Explains how the proposal was evaluated against EPA and DEP requirements (Page 9);

IV. Describes proposed next steps toward implementation of the site cleanup proposal (Page 10);

V. Explains the opportunities for public participation, including how you can comment on this proposal and where you can find more information (Page 11); and

VI. Includes a glossary to explain terms used in the document (Page 14).

I. FACILITY DESCRIPTION, HISTORY, AND SUMMARY OF INVESTIGATIONS

Facility Description

The seven-acre Thomas G. Faria Corporation (Faria) facility is located at 385 Norwich-New London Turnpike in Uncasville, Connecticut (see Figures 1 and 2). The site consists of a 100,000 square-foot manufacturing and storage facility which includes fifteen buildings.

Environmental Setting

The facility is bordered on the north by residential properties, on the east by Pink Row and residential properties, and to the south and west by residential properties, commercial development, and undeveloped areas. Oxoboxo Brook runs through the property from west to east and flows into the Thames River east of the site. The groundwater at the Faria facility and in the downgradient area, through which groundwater from the facility flows, is classified by DEP as "GA." Groundwater classified as GA is intended for existing private and potential public or private supplies of water suitable for drinking without treatment.

Facility History and Operations

The facility was initially constructed as a woolen mill in the 19th century. Additional buildings were constructed over time, prior to Faria's purchase of the property in 1964. The Faria Corporation has manufactured gauges for motor-powered vehicles at this facility since 1964.

As was typical for manufacturing operations at that time, Faria used chlorinated organic solvents, such as tetrachloroethylene and trichloroethylene, for degreasing metal parts until 1987. Faria stored waste solvent on-site prior to off-site disposal. Faria also performed electroplating of metal parts and from 1973 through 1981 dried metal hydroxide sludges from its wastewater treatment system in a series of four former earthen on-site impoundments.

Plans for Future Use of Facility

Faria Corporation plans to continue its manufacturing operations at the facility during and following site cleanup.

Environmental Investigation and Cleanup

In the early 1980s, private drinking water wells near the facility were found to be contaminated with trichloroethylene, tetrachloroethylene, and 1,1,1-trichloroethane, believed to be from Faria's operations. These chemicals are part of a class of chemicals known as volatile organic compounds (VOCs) and may pose a risk to human health if there is sufficient exposure to these chemicals. In 1982, DEP negotiated a Consent Agreement with Faria requiring Faria to provide

an alternate water supply to 16 homes where contaminated water supply wells were identified. Faria met its obligations under this order, making public water available to the downgradient neighborhood and providing public water connections, initially to 18 properties and subsequently to several others.

In addition, Faria has completed several other cleanup activities on its property:

- In 1983, Faria removed VOC-contaminated soil from beneath an outside storage area north of Building M-10 where it had stored waste solvents.
- In 1983, Faria removed and properly disposed of waste sludges from its former on-site impoundments.
- In 1985, Faria installed an on-site groundwater treatment system which pumped contaminated groundwater from underground, treated it to remove the VOCs, and discharged the treated groundwater into Oxoboxo Brook under a DEP-issued permit.
- During the 1990s, Faria removed four fuel oil above-ground storage tanks and their concrete pads.

In 1999, EPA issued a Resource Conservation and Recovery Act (RCRA) § 3013 order to Faria requiring investigation of remaining hazardous wastes at the facility. Since that time, Faria has performed an investigation of the nature and extent of contamination from its facility sufficient to support this proposal. In addition, Faria has performed the following steps to address contamination:

- In 2000, Faria replaced the 1985 groundwater treatment system with a larger system that pumped additional groundwater to better contain the off-site migration of VOCs in groundwater. The system treated groundwater using an air stripper to transfer VOCs in water to air and treated the air with carbon filtration prior to release.
- In 2003, after testing soil vapor and indoor air in homes on Pink Row in the area where VOCs were present in shallow groundwater, Faria installed subsurface ventilation systems in four homes as a precaution to keep vapors from entering the home.
- Faria has continued to provide alternate water supplies to homes where contaminated water supply wells were identified.

II. FARIA'S PROPOSAL FOR ADDITIONAL CLEANUP

Faria is proposing the following measures in seven areas of their property and the downgradient area, as described in this section and shown on Figure 2. The goals of Faria's proposed actions are 1) to meet the requirements of the Resource Conservation and Recovery Act (RCRA) Corrective Action program, which requires that the site be cleaned up to conditions safe for humans and the environment; and 2) to comply with the State of Connecticut Remediation Standard Regulations (CT RSRs).

Area 1 – Former Above Ground Storage Tanks

Description:
This area formerly included four 275-gallon fuel oil above-ground storage tanks (ASTs), which were removed in the 1990s. Surface soil in this area has been found to contain elevated levels of polycyclic aromatic hydrocarbons (PAHs), which may have resulted from small releases of fuel oil. The area of impacted soil extends to a depth of less than two feet below ground surface in an approximately 3,340 square-foot area bounded to the north by Oxoboxo Brook and to the south by Faria's parking lot.

Proposal:
The proposal for this area is to excavate impacted soil using a backhoe, where possible, and hand tools in the area within 10 feet of overhead power lines. Excavated soil would be stockpiled and tested to select an appropriate off-site disposal facility. Following excavation, remaining soil would be tested to evaluate compliance with the CT RSRs. The specific RSR cleanup goals for this area are the Residential Direct Exposure Criteria and the GA Pollutant Mobility Criteria. Following excavation and demonstration of compliance with the CT RSR cleanup criteria, the area would be backfilled with clean fill and topsoil to the original grade and landscaped.

Area 2 – Alley Between Buildings M-6 and M-11

Description:
This area is an alley that extends between Buildings M-6 and M-11. Elevated concentrations of metals are present in soil to an unknown depth in this 600 square-foot area. Access to this area is limited by the presence of the facility smokestack.

Proposal:
Due to the limited access to this area and the concern for undermining the stability of adjacent buildings and the smokestack, it is not feasible to excavate all impacted soil in this area. Therefore, the proposal is to excavate soil to a depth of two feet and dispose of excavated soil at an appropriate off-site disposal facility. Remaining soil would be capped with a layer of low-permeability soil as necessary to prevent leaching of remaining soils exceeding the GA Pollutant Mobility Criteria. The area would also be paved to prevent human contact with any remaining soils exceeding the Residential Direct Exposure Criteria. An institutional control, such as an Environmental Land Use Restriction (ELUR), would be recorded on the land records for this area to ensure that the cap is maintained.

Area 3 – Parking Lot North of Buildings M-10 and M-11

Description:
Elevated concentrations of arsenic, PAHs, and VOCs have been detected in soil above the water table in this area. In addition, elevated concentrations of chromium have been detected in one

groundwater monitoring well. The chromium in groundwater is thought to have originated from soils located above the water table.

Proposal:
Soil would be excavated to a depth of two feet, as deeper excavation could compromise the stability of adjacent buildings. Remaining soil would be capped with a layer of low-permeability soil as necessary to prevent leaching of remaining soils exceeding the GA Pollutant Mobility Criteria. The area would be paved to prevent exposure to any remaining soils exceeding the Residential Direct Exposure Criteria. An institutional control, such as an ELUR, would be recorded on the land records for this area to ensure that the cap is maintained. A soil vapor extraction (SVE) system would also be installed to address VOCs in soil (see discussion of SVE system in Area 4).

Area 4 – Soil Impacts Below Building M-10

Description:
VOCs are present in soil in an estimated 3,500 square foot area, extending to the depth of the water table (12 feet below grade) under Building M-10. As this VOC-impacted soil is contiguous with that in Area 3, the two areas will be cleaned-up together.

There is also an area with elevated concentrations of metals and PAHs in soil beneath building M-10.

Proposal:
As Faria plans to maintain Building M-10, underlying soils are not accessible for excavation. Therefore, SVE is proposed for VOCs in soils above the water table in Areas 3 and 4. SVE works by drawing vapors through soils to a series of wells that are put under vacuum. SVE thereby removes VOCs bound to soil and prevents VOC vapors from entering the overlying building. Faria would treat the vapors by carbon filtration to filter out VOCs prior to release, as they have been doing with the groundwater treatment system vapor emissions. The SVE system would operate until soil vapor concentrations comply with CT RSR Residential Soil Vapor Volatilization Criteria. If, after a reasonable period of SVE system operation, soil vapor concentrations have not met the CT RSR Residential Soil Vapor Volatilization Criteria, an institutional control, such as an ELUR, would be recorded to require installation and operation of a subsurface ventilation system to prevent subsurface vapors from entering the building.

For metals and PAHs in soil beneath Building M-10, the presence of the building would prevent exposure to these soils and prevent these contaminants from leaching into groundwater. An institutional control, such as an ELUR, would be recorded for the area to ensure that the building stays in place.

Area 5 – Oxoboxo Brook and Gairs Pond

Description:
Oxoboxo Brook, which is dammed just upstream of the Faria facility beyond the Norwich-New London Turnpike (Route 32), is approximately 15 feet wide where it passes through the Faria facility in a stream channel dating from the early 20th century, when the brook served as a power source to the woolen mill that formerly occupied the facility. Oxoboxo Brook drains an approximately 7,744-acre watershed, which extends roughly 7 miles from its headwaters above Oxoboxo Lake to the Thames River.

In the section of Oxoboxo Brook that passes through the Faria facility property, the water moves at a fast speed and the streambed consists of cobbles with minimal sand and gravel. Sediment samples showed PAHs and metals in isolated portions of the brook in the section that passes through the facility.

Oxoboxo Brook discharges to Gairs Pond, a man-made impoundment located approximately 200 feet downstream of the Faria facility property. The brook then empties over an approximately 15-foot high spillway to the Thames River. Samples of surface sediment from Gairs Pond showed PAH and metal concentrations similar to those in surface sediments from similar ponded areas upstream of Faria.

Proposal:
Impacted areas of the brook are limited in area and depth and consist of very little sediment. Removing any remaining sediment is not practical, as it would involve scraping the rocks in areas where access is very difficult, and little benefit would result. Any metals and PAHs in the brook that originated from the Faria property were likely transported to the brook by stormwater run-off from areas of the facility where cleanup is proposed. Therefore, potential ongoing sources of contaminants to the brook will be addressed with the proposed remediation.

No remediation is proposed for Gairs Pond, as contaminant impacts in the pond are consistent with similar sediments upstream of Faria. However, if the Gairs Pond dam is ever removed, Faria would evaluate deeper sediments in Gairs Pond in advance of dam removal.

Area 6 – Southern Parking Lot

Description:
Groundwater under Faria's southern parking lot contains VOCs, likely from chlorinated solvents that were used at the site until 1987 for degreasing metal parts. These VOCs are thought to have reached groundwater in this area through the former septic system. When use of the septic tank ceased in 1982, its contents were pumped out and disposed and the tank was filled with soil. The existing groundwater treatment system, described in Section I of this document, was installed in this area in 1985 and upgraded in 2000.

Recent studies have shown that VOCs in soil in the area of the former septic tank may be dissolving into groundwater. An area of approximately 13,000 square feet extending to depths of 4 to 25 feet, including the former septic tank and leaching field, has VOCs in soil at levels that could impact groundwater. However, the area where VOCs appear most concentrated is the 300-square foot area which includes the septic tank remains and immediately surrounding soil.

Proposal:

The proposal for Area 6 involves three main components: excavation, soil vapor extraction, and groundwater extraction and treatment.

- Excavation: The former septic tank and surrounding soil would be removed over an approximately 300-square foot area to the depth of the seasonal low water table (approximately 10 feet below ground surface). Excavated soil and debris would be tested to determine whether it could be reused on site or disposed at an off-site disposal facility.

- Soil Vapor Extraction (SVE): SVE is proposed to reduce VOC concentrations in remaining soils above the water table, which cover an approximately 13,000 square-foot area. A row of extraction wells would be installed in this area and connected via underground piping to the SVE system proposed for Areas 3 and 4. The system would draw vapors through soils to these extraction wells, thereby removing the VOCs bound to soil. Faria would treat the vapors by carbon filtration to filter out VOCs prior to release, as they have been doing with the groundwater treatment system vapor emissions. The SVE system would operate until soil vapor concentrations comply with CT RSR Residential Soil Vapor Volatilization Criteria.

- Groundwater Extraction and Treatment: The current groundwater extraction and treatment system has been successful in removing VOCs from groundwater and reducing migration of VOC-contaminated groundwater from the property. Faria is proposing to expand the extraction well network to include extraction of shallow groundwater. Approximately 6 shallow extraction wells would be installed. In addition, the pumping rate at the existing deep extraction well would be increased. These improvements would be implemented to prevent the migration of contaminated groundwater from the Faria property. Groundwater testing would be performed at wells on the Faria property and off-site to evaluate system performance. The system would operate until on-site groundwater concentrations comply with the CT RSR GA Groundwater Protection Criteria. If compliance with the GA Groundwater Protection Criteria cannot be achieved within a reasonable timeframe for on-site groundwater, then a request for a variance due to the technical impracticability of groundwater remediation may be submitted to DEP. Also, an institutional control, such as an ELUR, would be recorded for the Faria property to prevent the use of groundwater on-site for drinking water until GA Groundwater Protection Criteria are achieved.

Area 7 – Off-site Groundwater Plume

Description:
VOC contamination was first discovered in residential wells on Pink Row, adjacent to the Faria facility property, in the early 1980s. Since that time, Faria has continued to test the groundwater between its facility and the Thames River, where groundwater discharges. Test results have shown substantial decreases of VOCs in groundwater over time, likely due to removal of contaminated soil and treatment of groundwater on-site and natural attenuation off-site.

Proposal:
In 1983, Faria provided public water connections to 18 properties. Since that time, Faria has continued to test residential wells and to connect properties with impacted wells to public water. In August 2003, after testing soil vapor and indoor air in homes on Pink Row in the area where VOCs were present in shallow groundwater, Faria installed subsurface ventilation systems in four homes as a precaution to keep vapors from entering the homes. These measures will continue to prevent exposures to VOCs while cleanup proceeds.

The groundwater extraction and treatment system upgrades proposed for the site are designed to prevent further migration of VOC-contaminated groundwater from the Faria property. This will allow VOC concentrations to continue to decrease in the area downgradient of Faria to meet the CT RSR GA Groundwater Protection Criteria. Faria will continue to monitor the off-site groundwater conditions to verify that the VOC concentrations decrease over time and to ensure that no further drinking water wells are at risk.

III. EVALUATION OF PROPOSAL

In developing this proposal, Faria evaluated multiple alternatives for each area of the site based on the following nine Remedy Selection Criteria, set forth in available EPA guidance:

Threshold Criteria:
- Overall Protection
- Attainment of Media Cleanup Standards
- Controlling Sources of Releases
- Compliance with Waste Management Standards

Balancing Criteria:
- Long-term Reliability and Effectiveness
- Reduction of Toxicity, Mobility, or Volume of Wastes
- Short-term Effectiveness
- Implementability
- Cost

These selection criteria provide a framework for measuring the effectiveness of a proposed remedy.[1] The proposed actions described in this document represent the cleanup alternatives that

1 Corrective Action for Releases from Solid Waste Management Units at Hazardous Waste Management Facilities; Proposed Rule. 61 Fed. Reg. 19432, 19449 (proposed May 1, 1996) found at the following page of EPA's website: http://www.epa.gov/fedrgstr/EPA-WASTE/1996/May/Day-01/pr-547.pdf

would best satisfy the selection criteria and achieve compliance with the CT RSRs.

A more detailed description of the proposed remedy and other cleanup alternatives considered and an evaluation of how each alternative met the above selection criteria is provided in the April 2009 Corrective Measures Study Report for Thomas G. Faria Corporation, prepared by AECOM, Inc. on behalf of Thomas G. Faria Corp., available at the Raymond Library, 832 Raymond Hill Rd, Oakdale, CT and the US EPA Records Center, 5 Post Office Square, Suite 100, Boston, MA.

IV. PROPOSED NEXT STEPS

This section includes a discussion of the likely next steps in implementing and completing the proposed cleanup plan, if it is approved by EPA and DEP following review of public comments.

Stewardship Permit

EPA and DEP expect that Faria would perform the proposed work in accordance with a DEP Stewardship Permit, which would define the long-term obligations for Faria and ensure that cleanup is documented as it is completed. A Stewardship Permit would also require that Faria provide financial assurance to ensure that funds are available for the cleanup. Faria's proposed schedule anticipates applying for a Stewardship Permit during spring of 2010. There would be a public comment period on the draft permit, which would likely occur during 2011. Additional information on DEP Stewardship Permits is available on the following page of DEP's website: http://www.ct.gov/dep/cwp/view.asp?a=2718&q=438420&depNav_GID=1646.

Cleanup Plan Implementation

If EPA and DEP approve Faria's cleanup proposal, EPA and DEP expect that Faria would spend the next several months collecting additional site data and designing the expanded groundwater extraction and treatment system, with the aim of having a detailed system design and monitoring plan by fall 2010. After this plan is reviewed by EPA and DEP, Faria would likely construct and start operating the modified groundwater extraction and treatment system during the summer of 2011. A design plan for the soil excavation, capping, and construction of the SVE system would follow during the fall of 2011 with construction to occur in spring of 2012.

Operation and Maintenance of the Treatment Systems

After the soil excavation is completed and SVE and groundwater extraction and treatment systems are constructed, EPA and DEP expect that these treatment systems would operate for several years before soil vapor and groundwater comply with the CT RSRs. During this period, Faria would perform regular monitoring of VOC concentrations in soil vapor in areas being addressed by the SVE system. In addition, Faria would monitor VOC concentrations in groundwater on the facility property and in the off-site downgradient area.

Closure of Resource Conservation and Recovery Act Regulated Units

As required under the Resource Conservation and Recovery Act (RCRA), Faria notified EPA and DEP in 1980 regarding the on-site units where hazardous waste was treated, stored or disposed for more than 90 days. Based on Faria's notification at that time, EPA and DEP have tracked the following areas as RCRA-regulated units:

- Inside Drum Storage Area: This area was located in Faria building M-10 and included a wastewater treatment system with a 1,200-gallon treatment tank, and temporary storage of up to twelve 55-gallon drums used to contain waste awaiting off-site disposal.
- Surface Impoundments: This area was located in what is now the southern parking lot and was comprised of four earthen cells, approximately 2 feet wide and 3 feet deep and of lengths ranging from 9 to 12 feet. These cells were used to dry metal hydroxide sludges from Faria's wastewater treatment system.
- Outside Drum Storage Area: This area was located on the north side of building M-10 and housed two 500-gallon steel tanks for storing new and used tetrachloroethylene as well as 55 gallon drums of used tetrachloroethylene and metal hydroxide sludge awaiting off-site disposal.

On September 6, 1983 and August 20, 1985, Faria certified that these areas were closed in accordance with a closure plan that was approved by DEP on June 28, 1983. Results of investigation performed by Faria during recent years have confirmed that all metal hydroxide sludge was removed from the former Surface Impoundments. Soils surrounding the former impoundments meet the CT RSR criteria and downgradient groundwater meets the CT RSR criteria for metals. Residual contaminant impacts to groundwater from the former Surface Impoundments or to soil or groundwater from the Inside Drum Storage Area and the Outside Drum Storage Area are co-mingled with chemical releases from other past facility operations and will be addressed by Faria's site-wide cleanup proposal.

Faria is currently not carrying financial assurance for these RCRA-regulated units. This is in accordance with a June 1, 1984 letter from DEP stating that Faria was exempt from requirements to carry financial assurance for these units.

V. PUBLIC PARTICIPATION

Public Comment Invitation

All interested persons are invited to express their views on the proposal. Public comment on all proposals, and supporting information, is an important contribution to EPA's and DEP's decision-making.

Written comments on this proposal will be accepted if provided to EPA from June 1 through July 16, 2010. To comment formally, please send written comments, post marked no later than July 16, 2010 to:

Stephanie Carr
EPA Region 1
5 Post Office Square - Suite 100
Mail Code: OSRR07-03
Boston, MA 02109-3912
e-mail: carr.stephanie@epa.gov
fax: 617/918-0363

A comment form and mailer is included at the end of this document.

Public Meeting

Faria will hold a public information meeting which will include a brief presentation on the proposal and an opportunity for questions and discussions. Here are the details for the meeting:

DATE: June 15, 2010
TIME: 7:00 pm
LOCATION: Council Chambers, Montville Town Hall (first floor), 310 Norwich – New London Tpke., Uncasville, CT

Response to Public Comments/Decision-Making Process

EPA and DEP will not make a final decision regarding this proposed cleanup plan until the public comment period has closed and all received comments have been evaluated and addressed. Based on any substantial new information or comments from the public, EPA and DEP may modify this proposal. A brief decision-making document (Decision Document) that responds to comments will be prepared by EPA and DEP to address all significant public comments received during the public comment period. If the comments are such that significant changes are made to this proposal, EPA and DEP will seek additional public comments on a revised proposal. If no comments are received, EPA and DEP's final decision will be issued in a brief letter to Faria.

Additional Information

This document provides only a summary description of the investigation and activities performed at the Faria facility. Therefore, the public is encouraged to consult the Faria Administrative Record for a more complete discussion. The Faria Administrative Record includes documents containing the information on which this proposal is based. These documents include this Statement of Basis, environmental assessment reports describing Faria's release and operation history, the results of site investigation activities, reports on remediation performed at the Faria and other documents which provide additional or supplemental information regarding the work conducted at the Faria facility.

The Faria Administrative Record index and important documents from the Faria Administrative Record are available for review at:

The Raymond Library
832 Raymond Hill Rd., Oakdale, CT
Phone: 860/848-9943
Hours are:
Tues. – 12:00 noon to 8:00 pm
Wed. & Thurs. – 10:00 am to 6:00 pm
Saturday 9:00 am to 1:00 pm

The entire Faria Administrative Record is available at:

US EPA Records Center
5 Post Office Square – Suite 100
Boston, MA 02109-3912
(617) 918-1440
The Records Center hours are Monday-Friday
9:00 a.m. to 5:00 p.m. – by appointment
closed on federal holidays

To request documents from the Faria Administrative Record, please contact Stephanie Carr, EPA, phone: 617/918-1363, toll free phone: 1-888-EPA-REG1 (1-888-372-7341), ext. 81363, e-mail: carr.stephanie@epa.gov.

This Statement of Basis, the Faria Administrative Record Index, and other information on the Faria facility are available at EPA's web page for the Faria facility at http://www.epa.gov/ne/rcra/faria.

For additional information regarding this proposal, please contact the following individuals:

Stephanie Carr, EPA Region 1
phone: 617/918-1363
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Drew Kukucka, CT DEP
phone: 860-418-5955
e-mail: drew.kukucka@ct.gov

Patrick Haskell, AECOM (Faria's environmental consultant)
phone: 978-589-3160
e-mail: patrick.haskell@aecom.com

VI. GLOSSARY

Connecticut Remediation Standard Regulations (RSRs): The CT RSRs provide detailed guidance and standards that may be used at any site to determine whether remediation of contamination is necessary to protect human health and the environment. The RSRs are found in Sections 22a-133k-1 through 22a-133k-3 of the Regulations of Connecticut State Agencies (RCSA), adopted January 30, 1996. The RSRs can be found on the following page of the Connecticut Department of Environmental Protection website: http://www.ct.gov/dep/cwp/view.asp?a=2715&q=325012&depNav_GID=1626. CT RSR cleanup criteria discussed in this document include the following:

- Direct Exposure Criteria (DEC): The DEC are designed to protect human health and the environment from potential risks associated with direct exposure to contaminated soils.
- Pollutant Mobility Criteria (PMC): The PMC are designed to protect groundwater from contaminants that may leach from the soil to the groundwater.
- Groundwater Protection Criteria (GWPC): The GWPC are designed to protect groundwater resources that are currently used or have the potential to be used for public or private drinking water supplies.
- Volatilization Criteria (VC): The VC are designed to protect occupants of buildings near polluted groundwater from volatile contaminants (chemicals that evaporate easily) that could evaporate and enter these buildings as a gas.
- Surface Water Protection Criteria (SWPC): The SWPC are designed to ensure that polluted groundwater discharging to surface water does not adversely affect surface water quality.

Corrective Action: Corrective Action refers to obligations for facilities regulated under the Resource Conservation and Recovery Act to investigate and remediate releases of hazardous waste or hazardous constituents at or from the facility to soil, groundwater, surface water, sediments, or air. The Corrective Action program in Connecticut has been delegated from EPA to DEP and is administered according to the Regulations for Connecticut State Agencies (RCSA) Section 22a-449(c)-104(a)(2)(O) (Corrective action for solid waste management units), incorporating 40 CFR 264.101, available on DEP's website: http://www.ct.gov/dep/lib/dep/regulations/22a/22a-449(c)100through119.pdf.

Environmental Land Use Restriction (ELUR): An ELUR is a restrictive covenant that is recorded on the municipal land records for a property and runs with the land. The purpose of an ELUR is to prevent certain types of uses of a property, to limit specific activities on a contaminated property or to minimize the risk of exposure to the pollutants. ELURs are described in Section 22a-133q-1 of the Regulations of Connecticut State Agencies (R.C.S.A.) found on DEP's website: http://www.ct.gov/dep/lib/dep/regulations/22a/22a-133k-1through3.pdf.

GLOSSARY (continued)

Institutional Control: Institutional controls are administrative and legal controls that help minimize the potential for human exposure to contamination. Institutional controls can play an important role in site remedies because they reduce exposure to contamination by limiting land or resource use and guide human behavior at a site. Institutional controls are typically used when contamination is first discovered, when remedies are ongoing, and when residual contamination remains onsite at a level that does not allow for unrestricted use and unlimited exposure after cleanup. An ELUR (defined above) is a type of institutional control specified by Connecticut state regulations.

Resource Conservation and Recovery Act (RCRA): The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was enacted in 1976 to address municipal and industrial solid waste with the goals of protecting human health and the environment from the potential hazards of waste disposal, conserving energy and natural resources, reducing the amount of waste generated, and ensuring that wastes are managed in an environmentally safe manner. The term "RCRA" is often used interchangeably to refer to the laws enacted by the U.S. Congress and the U.S. EPA regulations which carry out the congressional intent by providing explicit, legally enforceable requirements for waste management. The laws include the Solid Waste Disposal Act, Resource Conservation and Recovery Act, and Hazardous, Solid Waste Amendments and subsequent amendments and can be found at 42 U.S.C §§ 6901 et seq. The regulations can be found at Title 40 of the Code of Federal Regulations (CFR) Parts 239 through 282.

Technical Impracticability Variance: A Technical Impracticability (TI) Variance is specificed under Section 22a-133k-3(e)(1)of the Regulations of Connecticut State Agencies, found at http://www.ct.gov/dep/lib/dep/regulations/22a/22a-133k-1through3.pdf. DEP may grant a TI Variance based on a demonstration that remediation performed to the extent technically practicable has reduced concentration of pollutants in groundwater to steady state concentrations that exceed applicable CT RSR criteria.

REFERENCES

Corrective Action for Releases from Solid Waste Management Units at Hazardous Waste Management Facilities; Proposed Rule. 61 Fed. Reg. 19432, 19449 (proposed May 1, 1996) found at the following page of EPA's website: http://www.epa.gov/fedrgstr/EPA-WASTE/1996/May/Day-01/pr-547.pdf

RCRA Orientation Manual 2006 found at http://www.epa.gov/osw/inforesources/pubs/orientat/

Remediation Standard Regulations Fact Sheet found at http://www.ct.gov/dep/cwp/view.asp?a=2715&q=325014&depNav_GID=1626

Final Guidance on Completion of Corrective Action Activities at RCRA Facilities 68 Federal Register 8757 at 8761, February 25, 2003 available at: http://www.epa.gov/epawaste/hazard/correctiveaction/resources/guidance/gen_ca/compfedr.pdf

Corrective Measures Study Report, April 2009, prepared by AECOM, Inc. for Thomas G. Faria Corporation

Draft Screening Level Ecological Risk Assessment, April 2007, prepared by ENSR Corporation for Thomas G. Faria Corporation.

Closure Plan for Outside Drum and Tank Storage Area, Inside Drum Storage Area, Surface Impoundment Area, Boiler House Storage Area with transmittal letter dated May 15, 1982 from Eugene Proulx, Faria to Cindy Gilder, EPA

Letter dated August 1982 from Stephen W. Hitchcock, DEP re: financial assurance

Letter dated June 28, 1983 from Stanley J. Pac, Commissioner to Eugene R. Proulx, Faria re: closure plan

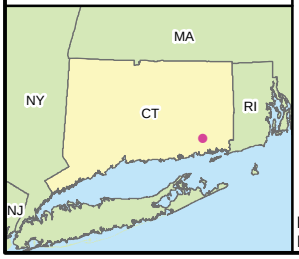
Letter dated September 6, 1983 from Eugene Proulx, Faria to Barry Giroux, CT DEP re: closure certification of areas B, C, and D

Letter dated April 5, 1984 from Eugene Proulx, Faria to Barry Giroux, CT DEP re: request for clarification of financial assurance requirements

Letter dated June 1, 1984 from Barry Giroux, CT DEP to Eugene Proulx, Faria re: DEP financial assurance requirements

Letter dated August 20, 1985 from Joseph Arpin, Faria to Ken Major, CT DEP re: closure certification for area A

Map Location



Site Location Map

Thomas G. Faria Corporation
Uncasville, CT

0 500 1,000 2,000 3,000 4,000 5,000 6,000 Feet

0 100 200 400 600 800 1,000 1,200 1,400 1,600 Meters

Map Projection: State Plane, NAD 83, Feet.
Image Source: USGS Topographic Quadrangle: Uncasville, CT.

Scale: 1:24,000

AECOM

Figure 1

Date: April 2009

Project #: 10125-004

J:\Indl_Service\Project Files\Faria_10125001\GIS\Projects\4-09\Figure 1 Site Location Map.mxd

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W E
S

AECOM
AECOM Environment
2 TECHNOLOGY PARK DRIVE
WESTFORD, MA 01886
(978) 589-3000
www.aecom.com

ANTICIPATED REMEDIATION ELEMENTS

THOMAS G. FARIA CORP.
UNCASVILLE, CT

Scale:	Date:	Project Number:
1" = 70'	4/09	10125-004-0009

Figure Number:
2

Sheet Number:
1

\\Uswes001\jobs\Indl_Service\Project Files\Faria_10125001\CM\S\Statement of Basis\Statement of Basis Figure 2.mxd

Please Use This Space to Write Your Comments

EPA and DEP welcome your input on this proposal for cleanup at the Thomas G. Faria Corporation (Faria) facility at 385 Norwich – New London Turnpike, Uncasville, CT. This form is to make it easier for you to mail or fax written comments. EPA also welcomes comments by e-mail. **Please fax, e-mail or postmark your comments no later than July 16, 2010 to:**

Stephanie Carr
EPA Region 1
5 Post Office Square - Suite 100
Mail Code: OSRR07-03
Boston, MA 02109-3912
e-mail: carr.stephanie@epa.gov
fax: 617/918-0363

(Attach sheets as needed)

Comment Submitted by... Name: _____
Address & phone (optional): _____
_____
_____

FARIA REMEDY PROPOSAL Comment Form (continued)

Fold, staple, stamp, and mail----------

Place
Stamp
Here

Stephanie Carr
EPA Region 1
5 Post Office Square - Suite 100
Mail Code: OSRR07-03
Boston, MA 02109-3912